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10 Attorneys for Plaintiff

11 UNITED STATES DISTRICT COURT

12 DISTRICT OF ARIZONA

13 Valentino Dimitrov, individually, and on  
14 behalf of all others similarly situated;

15 Plaintiff,

16 v.

17 Stavatti Aerospace, Ltd, a Minnesota  
18 corporation; Stavatti Aerospace, Ltd, a  
19 Wyoming corporation; Stavatti  
20 Corporation, a Minnesota corporation;  
21 Stavatti Immobiliare Ltd, a Wyoming  
22 corporation; Stavatti Industries, Ltd, a  
23 Wyoming corporation; Stavatti Niagara,  
24 Ltd., a New York corporation Stavatti  
Super Fulcrum, Ltd, a Wyoming  
corporation; Stavatti Ukraine, a Ukrainian  
business entity; Stavatti Heavy Industries  
Ltd, a Hawaii corporation; Christopher  
Beskar and Maja Beskar, husband and  
wife; Brian Colvin and Corrina Colvin,  
husband and wife; John Simon and Jean  
Simon, husband and wife; William  
Mcewen and Patricia Mcewen, husband  
wife; Rudy Chacon and Jane Doe Chacon,  
husband and wife; and Does 1 through 10,  
inclusive

Defendants.

Case No. 2:23-CV-00226-PHX-DJH

**STIPULATED MOTION TO AMEND  
THE SCHEDULING ORDER**

(Assigned to the Hon. Diane J. Humetewa)

25 The parties, by and through undersigned counsel, have conferred regarding ongoing  
26 discovery matters and have decided they would benefit from a minor modification to the  
27 scheduling order; specifically, amendment of Paragraph 4 of the Scheduling Order to change  
28

1 the deadline for completing fact discovery from November 30, 2024, to January 31, 2025.  
2 Accordingly, the parties hereby move the Court to enter the attached proposed second order.

3  
4 **RESPECTFULLY SUBMITTED** this 8th day of November 2024

5  
6 Enara Law PLLC

7 BY /s/ George Chebat  
8 George Chebat

9 The Law Office of Terrance D. Dunmire

10 BY /s/ Terry Dunmire  
Terrance D. Dunmire (filed with permission)

11 The Law Office of Nino Abate PLC

12 BY /s/ Nino Abate  
13 Nino Abate (filed with permission)

**CERTIFICATE OF SERVICE**

I hereby certify that on the 8th day of November 2024, a copy of the foregoing was transmitted electronically to the CM/ECF filing system for filing and transmittal along with copies transmitted to all parties and counsel of record via the CM/ECF system.

By: Shelly N. Witgen, ACP